

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ORGANO GOLD INT'L, INC., a Washington  
corporation,

Plaintiff,

v.

LUIS VENTURA, an individual, LUZ  
ANGELA VENTURA, an individual; and  
L&A VENTURA MANAGEMENT, INC., a  
Texas corporation,

Defendants.

NO. 2:16-CV-00487-RAJ

DECLARATION OF GIANSAVVO  
LICARI IN OPPOSITION TO MOTION  
FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION

I, Giansalvo ("John") Licari, do say and declare:

1. I am the chief operating officer ("COO") of Total Life Changes, LLC ("TLC").

As such, I oversee all of TLC's daily operations and report directly to the chief executive officer, Jack Fallon. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

2. TLC is a nutritional supplement company which uses the marketing (multi-level) network distribution channel to sell a wide range of consumer products. TLC's range of products includes teas, oils, shapewear garments, skin care lotions, cleansing products, make-up products, weight loss products, and nutritional supplementation products. In total, TLC has a total of

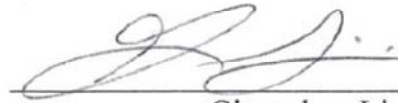
DECLARATION OF GIANSAVVO LICARI IN OPPOSITION TO  
MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION - 1  
(CASE NO. NO. 2:16-CV-00487-RAJ)

GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
eighteenth floor  
1191 second avenue  
seattle, washington 98101-2939  
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1 forty-eight (48) different products that are available for sale. Of these forty-eight (48) products,  
2 only five are ganoderma-infused coffee. In 2015, TLC's sales of ganoderma-infused coffee  
3 represented only 5.7% of total sales, and more than ninety percent (90%) of TLC's product sales  
4 were of products having nothing to do with ganoderma.

5 I declare under penalty of perjury under laws of the United States that the foregoing is true  
6 and correct.

7 Executed this 13th day of April, 2016 at Fair Haven, Michigan.

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10 Giansalvo Licari  
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DECLARATION OF GIANALVO LICARI IN OPPOSITION TO  
MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION - 2  
(CASE NO. NO. 2:16-CV-00487-RAJ)

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**CERTIFICATE OF SERVICE**

I, Greta Nelson, certify under penalty of perjury of the laws of the State of Washington that on April 14, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all associated counsel of record.

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SIGNED this 14th day of April, 2016 at Seattle, Washington.

s/ Greta Nelson

Greta Nelson, Legal Assistant  
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DECLARATION OF GIAN SALVO LICARI IN OPPOSITION TO  
MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION - 3  
(CASE NO. NO. 2:16-CV-00487-RAJ)

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